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a mass storage operatively connected to the processor.

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### **REMARKS**

In the Official Action, the Examiner rejected claims 1-31. By this Amendment, claims 1-6, 8-11, 13-19, 21, 27-30, and 33-36 have been amended, and new claims 39 and 40 have been added. Reconsideration of the application as amended is respectfully requested.

### **Rejections Under 35 U.S.C. 102**

The Examiner rejected claims 1-4, 10-16, 18-24, 29, 30 and 33-38 under 35 U.S.C. 102 as being anticipated by Richardson et al. (6,028,764).

Applicants respectfully traverse this rejection. Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under section 102, a single reference must teach each and every element or step of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984).

The Richardson et al. reference teaches a portable computer with a display screen, which is detachably connected to the remainder of the computer. When the screen is detached, communication may continue between the screen and the computer. Once removed, the display screen may be viewed from more convenient locations. For example, in a conference, one person can enter information on the keyboard while the display may be put at a more convenient viewing location (column 2 lines 14 – 23).

However, the Richardson et al. reference relied upon by the Examiner fails to teach each and every element of amended Claims 1, 13, 30, and 36 as recited above. For example, the Richardson et al. reference fails to teach a method or portable computer system comprising a portable base computer, and a portable user interface module comprising a user interface input/output device. As mentioned above, the Richardson et al. reference teaches a portable computer having a removable display screen. Upon removal, the display screen communicates with the base computer via radio or infrared communication. However, the detachable screen display disclosed in the Richardson et al. reference cannot transmit user input such as keystrokes, mouse pointer movement, or mouse clicks. In contrast, the user interface module described and claimed in the present application is detachable from the base computer, and capable of processing and transmitting keyboard, mouse, or other input. Because these claims recite a user interface comprising a user input device, and because the Richardson et al. reference does not teach a detachable device capable of transmitting user input, the Richardson et al. reference does not disclose, teach, or suggest every element recited in the rejected claims.

In view of the remarks set forth above, Applicant respectfully submits that the rejected claims are patentable over the cited art. Accordingly, Applicant respectfully requests withdrawal of the Examiner's rejections, and allowance of the rejected claims.

### **Rejections Under 35 U.S.C. § 103**

Claims 5, 7-9, and 25-28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richardson et al. (6,028,764) in view of Mizukata et al. (5,657,039), and claims 31 & 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richardson et al. (6,028,764) in view of Dat (5,831,818).

Applicants respectfully traverse these rejections since the teachings are insufficient for the Examiner to make out a *prima facie* case of obviousness. The burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (PTO Bd. App. 1979). Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention absent some teaching or suggestion support the combination. *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984). Accordingly, to establish a *prima facie* case, the Examiner must not only show that the combination includes all of the claimed elements, but also present a convincing line of reasoning as to why one of ordinary skill in the art would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 U.S.P.Q. 972 (B.P.A.I. 1985). When prior art references require a selected combination to render obvious a

subsequent invention, there must be some reason for the combination other than the hindsight gained from the invention itself. Something in the prior art as a whole must suggest the desirability, and thus the obviousness, of making the combination. *Uniroyal Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 U.S.P.Q.2d 1434 (Fed. Cir. 1988).

Regarding rejected Claims 5, 7-9, and 25-28, the combined references do not include all the elements of these amended claims rejected under section 103. It was shown above that the Richardson et al. reference does not teach all of the elements of amended independent Claims 1, 13, and 21, upon which these claims depend. Thus, the only way in which the combined Richardson et al. and Mizukata et al. references could include all of the elements of the rejected claims would be for the Mizukata et al. reference to include the elements missing from Richardson et al. The Examiner did not assert that the Mizukata et al. reference discloses a portable user interface module comprising a user input device. Indeed, upon review, Applicant does not find that Mizukata et al. teach the use of a portable user interface module comprising a user interface input/output device. Therefore, the cited combination does not support a *prima facie* case of obviousness under section 103.

Regarding rejected claims 31 and 32, the combined references do not include all elements of these amended claims rejected under section 103. It was shown above that the Richardson et al. reference does not teach all of the elements of amended Claim 30, upon which these claims depend. Thus, the only way in which the combined Richardson

et al. and Dat references could include all of the elements of the rejected claims would be for the Dat reference to include the elements missing from Richardson et al. The Examiner did not assert that the Dat reference discloses a portable user interface module comprising a user interface input device. Indeed, upon review, Applicant does not find that Dat teaches the use of a portable user interface module comprising a user input device. Therefore, the cited combination does not support a *prima facie* case of obviousness under section 103.

In view of the remarks set forth above, Applicant respectfully submits that the rejected claims are patentable over the cited art. Accordingly, Applicant respectfully requests withdrawal of the Examiner's rejections, and allowance of the rejected claims.

### **Conclusion**

In view of the above remarks and amendments set forth above, Applicant respectfully requests allowance of claims 1-40.

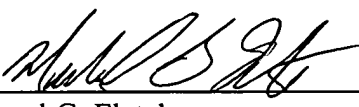
If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

**General Authorization for Extensions of Time**

In accordance with 37 C.F.R. § 1.136, Applicants hereby provide a general authorization to treat this and any future reply requiring an extension of time as incorporating a request therefor. Furthermore, Applicants authorize the Commissioner to charge the appropriate fee for any extension of time, **including the one month extension of time currently due**, to Deposit Account No. 03-2630; Order No. COMP:0060/FLE (PD-25744).

Respectfully submitted,

Date: July 21, 2000

  
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